BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	
and Their Impact upon the	)	
Existing Television Broadcast	)	MB Docket No. 87-268
Service	)	
	)	
To: The Commission		

COMMENTS

Red River Broadcast Co., LLC, the licensee of KBRR-TV, Thief River Falls, Minnesota, and permittee of KBRR-DT, Thief River Falls, Minnesota, Facility ID No. 55370 ("KBRR"), hereby submits these comments through counsel in response to the Commission's *Seventh Further Notice of Proposed Rulemaking* ("*Further Notice*") in this proceeding.[1] In the *Further Notice*, the Commission proposed a new digital television Table of Allotments ("DTV Table") which provides each eligible broadcast television station with a channel allotment for DTV operations after the February 17, 2009 transition.

KBRR respectfully requests that the Commission change the DTV Table to reflect the data described in the attached Engineering Statement prepared by Ryan Felmlee of Cohen Dippell & Everist, P.C. Incorporating the proposed changes into the DTV Table will serve the

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[1] *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Services*, Seventh Further Notice of Proposed Rulemaking, MB Docket No. 87-268, FCC 06-150, 21 FCC Rcd 12100 (rel. Oct. 20, 2006) ("*Further Notice*"). On January 9, 2007, the Commission extended the comment deadline to January 25, 2007. *See Order Granting Extension of Time for Filing Comments and Reply Comments,* MB Docket No. 87-268, DA 07-38 (MB rel. Jan. 9, 2007). Therefore, these comments are timely filed.

public interest by ensuring that the DTV Table is as technically accurate as possible and maximizes service to viewers.

Respectfully submitted,

Red River Broadcast Co., LLC

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January 25, 2007

Filed Via ECFS

4321597_v1

EXHIBIT E

ENGINEERING STATEMENT
ON BEHALF OF
RED RIVER BROADCAST CO., LLC
LICENSEE OF
KBRR-DT, THIEF RIVER FALLS, MINNESOTA
DTV CH. 10 9.7 KW ND ERP 113 METERS HAAT
IN RESPONSE TO
SEVENTH FURTHER NOTICE OF PROPOSED RULE MAKING
MB DOCKET NO. 87-268
JANUARY 2007

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President, Secretary and Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 24th day of January, 2007.

Notary Public

My Commission Expires: 2/28/2008

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Ryan Felmlee, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer of the Pennsylvania State University, has successfully completed the Engineer-In-Training examination ("EIT") in the State of Virginia, and is a staff engineer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Ryan Felmlee
District of Columbia

Subscribed and sworn to before me this 24th day of January, 2007.

Notary Public

My Commission Expires: 3/28/2008

This engineering statement has been prepared on behalf of Red River Broadcasting Co., LLC, licensee of KBRR(TV), Thief River Falls, Minnesota. The purpose of this engineering statement is to accompany a filing in response to the Seventh Further Notice of Proposed Rule Making, MB Docket No. 87-268 ("SFNPRM")[1] Appendix B of the SFNPRM the FCC's proposed table of allotments for DTV post-transition operation.

On FCC Form 381, KBRR elected to operate its post-transition DTV station at maximized facilities pursuant to pending DTV application (FCC File No. BPCDT-19991028AAV). KBRR will be operating its post-transition DTV facilities on channel 10, as opposed to the currently authorized DTV channel 32 non-directional operation. However, the azimuth pattern (see Figure 1) as assigned to the KBRR-DT post-transition operation is irregular and not non-directional as is the channel 32 pattern as certified. This irregular pattern as assigned in the Proposed DTV Table of Allotments is unrealistic for a VHF frequency and unable to be produced on an actual antenna. Therefore, KBRR hereby requests that the azimuth pattern as assigned in the SFNPRM be modified to a uniform non-directional pattern.

The KBRR (Facility ID No. 55370) post transition parameters as designated in the proposed DTV Table of Allotments are as follows:

Proposed DTV Table of Allotment Data

DTV CH.	ERP kW	HAAT meters	Antenna ID	Coordinates NAD 27	Area Sq. km	Population Thousand	Percent Interference Received
10	9.7	113	74660	48° 1' 19"N 96°22'12"W	16,952	121	0.3

The requested post-transition DTV parameters as requested in this statement are based on parameters in the proposed DTV Table of Allotments, with the exception of a uniform non-

[1] "In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service," pertaining to MB Docket No. 87-268, released October 20, 2006.

directional antenna pattern. The requested DTV parameters and associated data for post-transition based on the non-directional KBRR-DT maximized facilities are as follows:

Requested Data Corrections

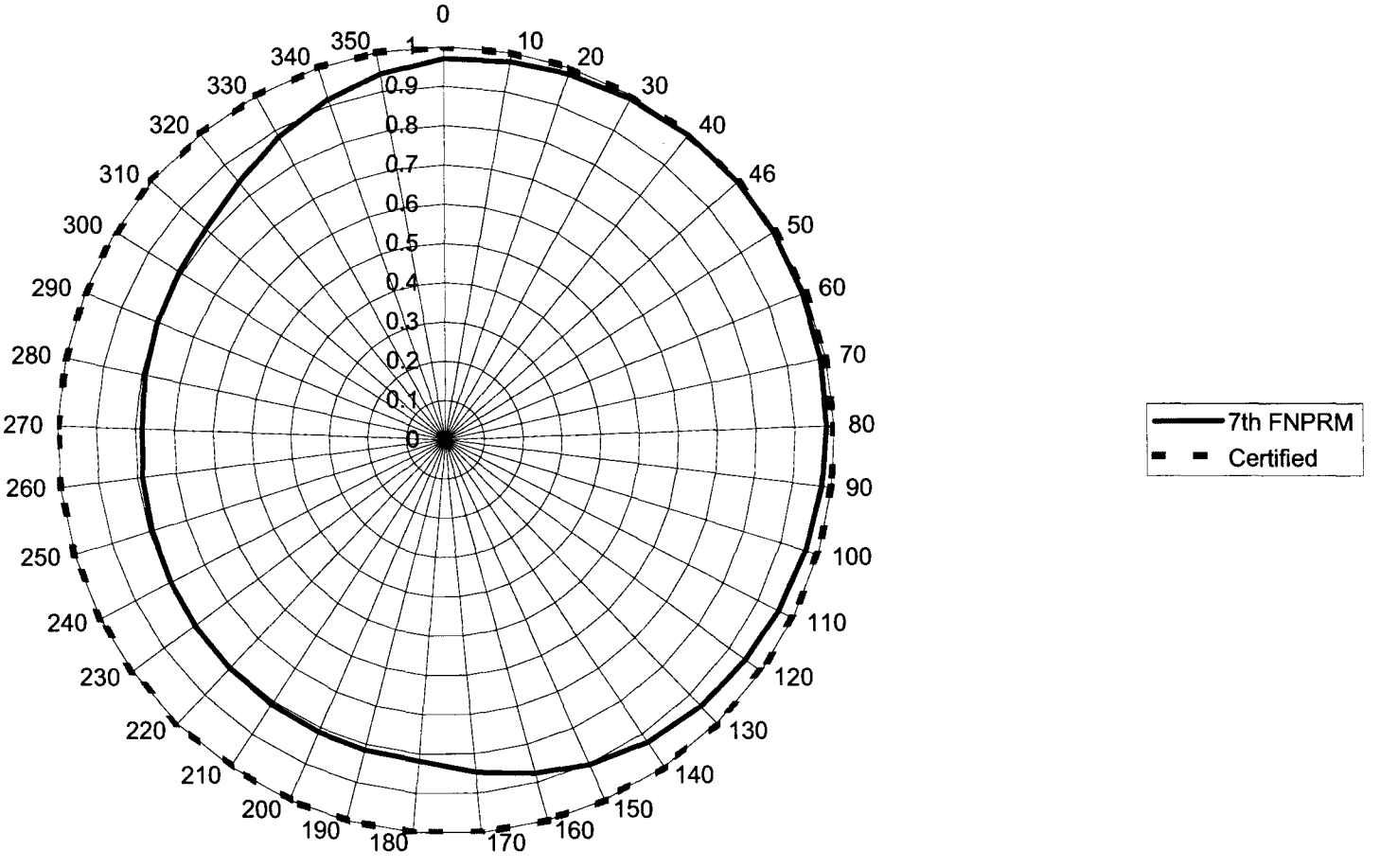
DTV CH.	ERP kW	HAAT meters	Antenna ID	Coordinates NAD 27	Area Sq. km	Population Thousand	Percent Interference Received
10	9.7	113	**ND**	48° 1' 19"N 96°22'12"W	**17,817**	**126**	**0.1**

To further support that the requested KBRR-DT post-transition facilities will have no impact, an interference study (see Table I) has been performed which takes into consideration and includes the proposed KBRR-DT non-directional facilities and all station certifications as designated in the SFNPR. Based on this Longley-Rice study, the KBRR-DT non-directional post-transition operation does not receive and causes no unacceptable new interference beyond that currently received and caused by the certified KBRR-DT facilities.

The Longley-Rice study of predicted interference caused by the proposed non-directional KBRR-DT post-transition facilities requested herein has been performed using a version of the Longley-Rice program as described in OET Bulletin No. 69 (February 6, 2004) and the Public Notice, "Additional Application Processing Guidelines for Digital Television (DTV)" (August 1998). The FCC's FORTRAN-77 code was modified only to the extent necessary (primarily input/output handling) for the program to run on a Windows98/Intel platform. Comparison of service/interference areas and populations indicates that this model closely matches the FCC's evaluation program. Best efforts have been made to use data and calculations identical to the FCC's

program. Any slight differences are attributable to compiler, operating system and/or processor characteristics. The effect of any variance in calculated population values versus the FCC's program is minimized when differencing a given model's results, such as calculating new interference as total interference less baseline interference. Any variance effect is further reduced when using ratios of calculated population values such as measuring the incremental population affected as a percent of the total population served. The model employs the Longley-Rice propagation methodology and evaluates in grid cells of approximately 4 km^2 terrain data sampled approximately every 1.0 km at one degree azimuth intervals with 2000 census centroids based on the information contained in the FCC engineering database released January 23, 2007 representing all post-transition DTV operations in Appendix B of the SFNPRM.

FIGURE 1
KBRR-DT AZIMUTH PATTERN



COHEN, DIPPELL AND EVERIST, P.C.

TABLE I
LONGLEY-RICE ANALYSIS
FOR THE POST-TRANSITION OPERATION OF
KBRR-DT, THIEF RIVER FALLS, MINNESOTA
CH 10 9.7 KW ND ERP 113 METERS HAAT
JANUARY 2007

Station	City	State	Channel	Distance km	Status	FCC File No.	Interference
KAWE	Bemidji	MN	9	144.8	CP	BDTV-49578BDTV	No New Interference
KWCM	Appleton	MN	10	318.5	CP	BPEDT-20000501AIK	No New Interference